

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,
Plaintiff,

v.

1. JORGE PARIS-LOPEZ,
a/k/a Ito,
[Counts 1, 2, and 3]
2. HECTOR ANDRADE-RUIZ,
a/k/a El Menor,
[Counts 1 and 2]
3. GUSTAVO GARZON-RINCON,
a/k/a J,
a/k/a Jaime Padilla,
[Counts 1 and 2]
4. JESUS IVAN SAENZ-BLANCO,
a/k/a Andrés,
a/k/a Roberto,
a/k/a Licenciado,
a/k/a Doctor,
[Counts 1, 2, and 3]
5. EDNA JIMENEZ-VELAZQUEZ,
a/k/a Enna,
a/k/a La Doña,
[Counts 1 and 3]
6. ROBERTO FERRARIO-POZZI,
a/k/a Robert,
[Counts 3 and 4]
7. RAFAEL HIDALGO-GARCIA,
a/k/a El Enano,
a/k/a Gigante,
[Counts 1, 2, and 3]
8. EDWIN COTTO-SANTIAGO,
a/k/a El Gato,
a/k/a El Niño,
aka El Loco,
a/k/a El Pequeño,
[Counts 1, 2, and 3]
9. CECILIO CEBALLOS,

SUPERSEDING INDICTMENT

CRIMINAL NO. 98-189(HL)

Violations:

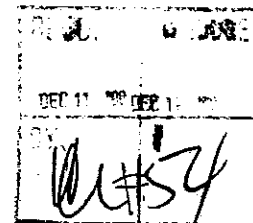
Title 21 U.S.C. 846,
(Conspiracy to possess and distribute
narcotics)

Title 21 U.S.C. § 960,
(Conspiracy to import narcotics)

Title 18 U.S.C. § 1956(h),
(Conspiracy to commit money
laundering)

Title 18 U.S.C. § 982
(Forfeiture)

(FOUR COUNTS)



SUPERSEDING INDICTMENT**Criminal No. 98-189(HL)****Page 2**

- | | | |
|-----|----------------------------|---|
| | a/k/a Neno, | * |
| | [Counts 1 and 3] | * |
| 10. | LUIS AMARANTE, | * |
| | a/k/a Chiqui, | * |
| | a/k/a El Grandote, | * |
| | [Counts 1 and 3] | * |
| 11. | PEDRO MARTINEZ-GRELA, | * |
| | a/k/a Cuca, | * |
| | [Counts 1 and 2] | * |
| 12. | RAMON RAMIREZ-BENITEZ, | * |
| | a/k/a El Viejo, | * |
| | a/k/a Moncho, | * |
| | [Counts 1, 2, and 3] | * |
| 13. | SARA N. ROSA, | * |
| | [Counts 1, 2 and 3] | * |
| 14. | RAMON RODRIGUEZ, | * |
| | a/k/a Pichón, | * |
| | [Counts 1 and 3] | * |
| 15. | JHON SANCHEZ-GUZMAN, | * |
| | a/k/a Mario, | * |
| | [Counts 1 and 3] | * |
| 16. | DEIVID ROJAS, | * |
| | a/k/a Gordo, | * |
| | [Count 3] | * |
| 17. | FRANCISCO VAZQUEZ, | * |
| | a/k/a Frank, | * |
| | a/k/a Francis, | * |
| | a/k/a El Gordo, | * |
| | [Counts 1 and 2] | * |
| 18. | JACKELINE ARACHE, | * |
| | a/k/a La Bruja, | * |
| | [Counts 1 and 3] | * |
| 19. | ROBERTO RODRIGUEZ-SANCHEZ, | * |
| | [Count 3] | * |
| 20. | GIUSEPPE PINCHERA-TORRICE, | * |
| | [Count 3] | * |
| 21. | MAHENDRA HAYES, | * |
| | a/k/a Neil, | * |
| | [Count 3] | * |
| 22. | LUIS R. RIVERA-VALENTIN, | * |
| | [Count 3] | * |

SUPERSEDING INDICTMENT

Criminal No. 98-189(HL)

Page 3

23.	ONELL MIRANDA-FERNANDEZ,	*
	[Count 3]	*
24.	RADAMES PEÑA-PEÑA,	*
	a/k/a El Negro,	*
	a/k/a El Chino,	*
	[Count 3]	*
25.	ALBERTO D. SANCHEZ-ALVAREZ,	*
	a/k/a Gilberto,	*
	[Counts 1 and 2]	*
26.	CARLOS M. SANCHEZ-ALVAREZ,	*
	[Counts 1 and 2]	*
27.	GILBERTO COWO,	*
	a/k/a El Toro,	*
	[Counts 1 and 2]	*
28.	ADRIANA ROJAS,	*
	[Count 3]	*
29.	MERCEDES R. DE LOS SANTOS,	*
	a/k/a Roxanna,	*
	[Count 3]	*
30.	MULTIPIX, INC.,	*
	a/k/a Phone Home,	*
	[Count 3]	*
	Defendants.	*

THE GRAND JURY CHARGES:

COUNT ONE
(Conspiracy to possess and distribute narcotics)

Beginning on a date unknown, but no later than on or about November of 1997, and ending on a date unknown, but no earlier than in or about the date of the return of this Superseding Indictment, in the District of Puerto Rico, and in Miami, Florida, New York City, New York, the Dominican Republic, St. Thomas, U.S.V.I., St. Marteen, N.A., Curacao, N.A., Barbados, B.V.I., Colombia, South America, the High seas and elsewhere, and within the jurisdiction of this Court, the defendants herein, and others to the Grand Jury known and unknown, including, but not

SUPERSEDING INDICTMENT

Criminal No. 98-189(HL)

Page 4

limited to,

1. JORGE PARIS-LOPEZ,
also known as Ito,
2. HECTOR ANDRADE-RUIZ,
also known as El Menor,
3. GUSTAVO GARZON-RINCON,
also known as J,
also known as Jaime Padilla,
4. JESUS IVAN SAENZ-BLANCO,
also known as Andrés,
also known as Roberto,
also known as Licenciado,
also known as Doctor,
5. EDNA JIMENEZ-VELAZQUEZ,
also known as Enna,
also know as La Doña,
7. RAFAEL HIDALGO-GARCIA,
also known as El Enano,
also known as Gigante,
8. EDWIN COTTO-SANTIAGO,
also known as El Gato,
also known as El Niño,
also known as El Loco,
also known as El Pequeño,
9. CECILIO CEBALLOS,
also known as Neno,
10. LUIS AMARANTE,
also known as Chiqui,
also known as El Grandote,
11. PEDRO MARTINEZ-GRELA,
also known as Cuca,
12. RAMON RAMIREZ-BENITEZ,
also known as El Viejo,
also known as Moncho,
13. SARA N. ROSA,
14. RAMON RODRIGUEZ,
also known as Pichón,
15. JHON SANCHEZ-GUZMAN,
also known as Mario,
17. FRANCISCO VAZQUEZ,

SUPERSEDING INDICTMENT

Criminal No. 98-189(HL)

Page 5

also known as Frank,
also known as Francis,
also known as El Gordo,
18. JACKELINE ARACHE,
also known as La Bruja,
25. ALBERTO D. SANCHEZ-ALVAREZ,
also known as Gilberto,
26. CARLOS M. SANCHEZ-ALVAREZ,
27. GILBERTO COWO,
also known as El Toro,

the defendants herein, did unlawfully, knowingly, willfully, and intentionally combine, conspire, confederate, and agree together with each other and with divers other persons to the Grand Jury known and unknown, to wit: to possess with intent to distribute more than one kilogram of heroin, and to distribute more than one kilogram of heroin, a Schedule I, Narcotic Drug Controlled Substance, which amounts of heroin exceeded one (1) kilogram, that is, conspiracy to violate Title 21. All in violation of Title 21, United States Code, Sections 846 and 841(a) (1).

OBJECTS OF THE CONSPIRACY

The objects of said conspiracy were, among others;

1. To import multi-kilogram amounts of controlled substances into the District of Puerto Rico for further distribution in Puerto Rico.
2. To recruit and maintain a group of individuals to facilitate the importation and distribution of heroin in Puerto Rico.
3. To avoid detection by governmental authorities of the organization's activities by using nicknames, placing properties under third parties, and bribing law enforcement officials.

MANNER AND MEANS TO ACCOMPLISH THE CONSPIRACY

SUPERSEDING INDICTMENT

Criminal No. 98-189(HL)

Page 6

The primary purpose of the conspiracy was to make money through the distribution of heroin within the District of Puerto Rico and elsewhere. The manner and means by which this purpose was carried out included, but are not limited to, the following:

1. It was part of the conspiracy that the defendants and their co-conspirators played different roles, took upon themselves different tasks, and participated in the affairs of the conspiracy through various criminal acts.

2. It was further part of the conspiracy that the defendants and their co-conspirators made themselves and their services available at various times throughout the conspiracy and participated in selected drug trafficking venture on an "as needed" basis.

3. It was further part of the conspiracy that the defendants and their co-conspirators distributed, caused to be distributed, and attempted to distribute quantities of narcotics in the District of Puerto Rico and elsewhere.

4. It was further part of the conspiracy that from on or about November of 1997 to on a date unknown, but no earlier than in or about the date of the return of this Superseding Indictment, JESUS IVAN SAENZ-BLANCO, a/k/a Andrés, a/k/a Roberto, a/k/a Licenciado, a/k/a Doctor, regularly distributed, caused to be distributed, and attempted to distribute narcotics to EDWIN COTTO-SANTIAGO, a/k/a El Gato, a/k/a El Niño, a/k/a El Loco, a/k/a El Pequeño, LUIS AMARANTE, a/k/a Chiqui, a/k/a El Grandote, CECILIO CEBALLOS, a/k/a Neno, JACKELINE ARACHE, a/k/a La Bruja, FRANCISCO VAZQUEZ, a/k/a as Frank, a/k/a Francis, a/k/a El Gordo, JORGE PARIS-LOPEZ, a/k/a Ito, RAFAEL HIDALGO-GARCIA, a/k/a El Enano, a/k/a Gigante, HECTOR L. ANDRADE-RUIZ, a/k/a El Menor, PEDRO MARTINEZ-GRELA, a/k/a Cuca,

SUPERSEDING INDICTMENT

Criminal No. 98-189(HL)

Page 7

RAMON-RAMIREZ-BENITEZ, a/k/a El Viejo, a/k/a Moncho, SARA N. ROSA, RAMON RODRIGUEZ, a/k/a Pichón, and others for redistribution in the District of Puerto Rico and elsewhere.

5. It was further part of the conspiracy that from on or about November of 1997 to on a date unknown, but no earlier than in or about the date of the return of this Superseding Indictment, JESUS IVAN SAENZ-BLANCO, a/k/a Andrés, a/k/a Roberto, a/k/a Licenciado, a/k/a Doctor, FRANCISCO VAZQUEZ, a/k/a El Gordo, EDWIN COTTO-SANTIAGO, a/k/a El Gato, a/k/a El Niño, a/k/a El Loco, a/k/a El Pequeño, JORGE PARIS-LOPEZ, a/k/a Ito, HECTOR L. ANDRADE-RUIZ, a/k/a El Menor, GUSTAVO GARZON-RINCON, a/k/a J, a/k/a Jaime Padilla, JHON SANCHEZ-GUZMAN, a/k/a Mario, RAFAEL HIDALGO-GARCIA, a/k/a El Enano, a/k/a Gigante, ALBERTO D. SANCHEZ-ALVAREZ, a/k/a Gilberto, CARLOS SANCHEZ-ALVAREZ, GILBERTO COWO, a/k/a El Toro, PEDRO MARTINEZ-GRELA, a/k/a Cuca, RAMON RAMIREZ-BENITEZ, a/k/a El Viejo, a/k/a Moncho, SARA N. ROSA, and others imported, caused to be imported, and attempted to import narcotics into the District of Puerto Rico and elsewhere.

OVERT ACTS

In furtherance of this conspiracy and to effect and accomplish the objects of it, one or more of the co-conspirators committed, among others, the following overt acts, in the District of Puerto Rico and elsewhere, within the jurisdiction of this Court:

1. During different times of this conspiracy, JESUS IVAN SAENZ-BLANCO, a/k/a Andrés, a/k/a Roberto, a/k/a Doctor, a/k/a Licenciado, EDWIN COTTO-SANTIAGO, a/k/a El Gato, a/k/a El Niño, a/k/a El Loco, a/k/a El Pequeño, JORGE PARIS-LOPEZ, a/k/a Ito, RAFAEL

SUPERSEDING INDICTMENT

Criminal No. 98-189(HL)

Page 8

HIDALGO-GARCIA, a/k/a El Enano, a/k/a Gigante, CECILIO CEBALLOS, a/k/a Neno, HECTOR L. ANDRADE-RUIZ, a/k/a El Menor, PEDRO MARTINEZ-GRELA, a/k/a Cuca, RAMON-RAMIREZ-BENITEZ, a/k/a El Viejo, a/k/a Moncho, SARA N. ROSA, RAMON RODRIGUEZ, a/k/a Pichón, JACKELINE ARACHE, a/k/a La Bruja, and others distributed, caused the distribution, and attempted to distribute, and possessed, caused the possession, and attempted to possess with intent to distribute multi-kilogram amounts of heroin in the District of Puerto Rico for redistribution.

2. At different times during the conspiracy, FRANCISCO VAZQUEZ, a/k/a Frank, a/k/a Francis, a/k/a El Gordo, met with cruise ship crew members to pick-up the heroin they were smuggling into the District of Puerto Rico for the JESUS IVAN SAENZ-BLANCO, a/k/a Andrés, a/k/a Roberto, a/k/a Doctor, a/k/a Licenciado, drug trafficking organization.

3. At different times during the conspiracy, JACKELINE ARACHE, a/k/a La Bruja, "stashed" (stored, and secreted from view) at her home narcotics, and monies from the sale and distribution of narcotics belonging to the JESUS IVAN SAENZ-BLANCO, a/k/a Andrés, a/k/a Roberto, a/k/a Licenciado, a/k/a Doctor, drug trafficking organization.

4. During different times of the conspiracy, PEDRO MARTINEZ-GRELA, a/k/a Cuca, RAMON RAMIREZ-BENITEZ, a/k/a El Viejo, a/k/a Moncho, and SARA N. ROSA purchased heroin from the JESUS IVAN SAENZ-BLANCO, a/k/a Andrés, a/k/a Roberto, a/k/a Licenciado, a/k/a Doctor, drug trafficking organization, for its later redistribution.

5. In or about the month of May 1998, EDWIN COTTO-SANTIAGO, a/k/a El Gato, a/k/a El Niño, a/k/a El Loco, a/k/a El Pequeño, did possess and deliver heroin to CECILIO CEBALLOS, a/k/a Neno, who in turn paid approximately \$20,000.00 Dollars in cash for the heroin

SUPERSEDING INDICTMENT

Criminal No. 98-189(HL)

Page 9

received.

6. In or about the end of May of 1998, EDNA JIMENEZ-VAZQUEZ, a/k/a Enna, a/k/a La Doña, introduced JORGE PARIS-LOPEZ, a/k/a Ito, to JESUS IVAN SAENZ-BLANCO, a/k/a Andrés, a/k/a Roberto, a/k/a Licenciado, a/k/a Doctor, as the person who could take over EDWIN COTTO-SANTIAGO, a/k/a El Gato, a/k/a El Niño, a/k/a El Loco's position as heroin smuggler and distributor within the drug trafficking organization described herein.

7. In or about the beginning of June 1998, LUIS AMARANTE, a/k/a Chiqui, a/k/a El Grandote, informed JORGE PARIS-LOPEZ, a/k/a Ito, as to the amount of income he could expect to receive as a smuggler and distributor of narcotics for the JESUS IVAN SAENZ-BLANCO, a/k/a Andrés, a/k/a Roberto, a/k/a Licenciado, a/k/a Doctor, drug trafficking organization.

8. In or about the beginning of June 1998, JESUS IVAN SAENZ-BLANCO, a/k/a Andrés, a/k/a Roberto, a/k/a Licenciado, a/k/a Doctor, did possess and delivered narcotics to ROBERTO RODRIGUEZ, a/k/a Pichón.

9. In or about the end of June 1998, RAFAEL HIDALGO-GARCIA, a/k/a El Enano, a/k/a Gigante, and JORGE PARIS-LOPEZ, a/k/a Ito, possessed heroin for its distribution in the District of Puerto Rico.

10. At different times during the month of August of 1998, JESUS IVAN SAENZ-BLANCO, a/k/a Andrés, a/k/a Roberto, a/k/a Licenciado, a/k/a Doctor, told FRANCISCO VAZQUEZ, a/k/a Frank, a/k/a Francis, a/k/a Gordo, to gather more information about the arrest of GILBERTO COWO, a/k/a El Toro, in St. Thomas, U.S.V.I., for the possession of heroin belonging to SAENZ-BLANCO.

SUPERSEDING INDICTMENT

Criminal No. 98-189(HL)

Page 10

11. On or about August 9, 1998, JHON SANCHEZ-GUZMAN, a/k/a Mario, contacted JESUS IVAN SAENZ-BLANCO, a/k/a Andrés, a/k/a Roberto, a/k/a Licenciado, a/k/a Doctor, to provide the address and telephone number where the heroin couriers, later identified as ALBERTO D. SANCHEZ-ALVAREZ, a/k/a Gilberto, and CARLOS M. SANCHEZ-ALVAREZ, kept the heroin smuggled from Colombia, South America for the drug distribution organization described herein.

12. On or about August 9, 1998, ALBERTO D. SANCHEZ-ALVAREZ, a/k/a Gilberto, and CARLOS M. SANCHEZ-ALVAREZ possessed approximately 1,319 grams (gross weight) of heroin, and attempted to distribute the same in the District of Puerto Rico.

13. On or about August 25, 1998, JORGE PARIS-LOPEZ, a/k/a Ito, HECTOR ANDRADE-RUIZ a/k/a El Menor, and GUSTAVO GARZON-RINCON, a/k/a J., a/k/a Jaime Padilla possessed approximately 1,449 grams (gross weight) of heroin, and attempted to distribute the same in the District of Puerto Rico.

14. In or about mid August of 1998, RAMON RAMIREZ-BENITEZ, a/k/a El Viejo, a/k/a Moncho, and JESUS IVAN SAENZ-BLANCO, a/k/a Andrés, a/k/a Roberto, a/k/a Licenciado, a/k/a Doctor, discussed the monetary debt of an unidentified co-conspirator, who had received heroin for redistribution without paying for it at the time. RAMIREZ-BENITEZ informed SAENZ-BLANCO that he had the "tools" to "fix that problem", namely, the weapons to cause the debtor's death.

15. Counts Two and Three are incorporated and realleged as overt acts of this conspiracy.

All in violation of Title 21, United States Code, Section 846.

SUPERSEDING INDICTMENT

Criminal No. 98-189(HL)

Page 11

COUNT TWO

(Conspiracy to import narcotics)

Beginning on a date unknown, but no later than in or about July of 1997, and ending on a date unknown, but no earlier than in or about the date of the return of this Superseding Indictment, in the District of Puerto Rico, and in Miami, Florida, New York City, New York, the Dominican Republic, St. Thomas, U.S.V.I., St. Marteen, N.A., Curacao, N.A., Barbados, B.V.I., Colombia, South America, the High Seas, and elsewhere, and within the jurisdiction of this Court,

1. JORGE PARIS-LOPEZ,
also known as Ito,
2. GUSTAVO GARZON-RINCON,
also known as J,
also known as Jaime Padilla,
3. HECTOR ANDRADE-RUIZ,
also known as El Menor,
4. JESUS IVAN SAENZ-BLANCO,
also known as Andrés,
also known as Roberto,
also known as Licenciado,
also known as Doctor,
7. RAFAEL HIDALGO-GARCIA,
also known as El Enano,
also known as Gigante,
8. EDWIN COTTO-SANTIAGO,
also known as El Gato,
also known as El Niño,
also known as El Loco,
also known as El Pequeño,
11. PEDRO MARTINEZ-GRELA
also known as Cuca,
12. RAMON RAMIREZ-BENITEZ,
also known as El Viejo,
also known as Moncho,
13. SARA N. ROSA,
17. FRANCISCO VAZQUEZ,

SUPERSEDING INDICTMENT

Criminal No. 98-189(HL)

Page 12

also known as Frank,
also known as Francis,
also known as El Gordo,
25. ALBERTO D. SANCHEZ-ALVAREZ,
also known as Gilberto,
26. CARLOS M. SANCHEZ-ALVAREZ,
27. GILBERTO COWO,
also known as El Toro,

the defendants herein, did unlawfully, knowingly, willfully, and intentionally combine, conspire, confederate, and agree together with each other and with divers other persons to the Grand Jury known and unknown, to wit: conspire to import into the United States from a place outside thereof, namely Colombia, South America, more than one (1) kilogram of heroin, a Schedule I Narcotic Drug Controlled Substance, in violation of Title 21, United States Code. All in violation of Title 21, United States Code, Sections 952(a), 963, and 960.

OVERT ACTS

In furtherance of this conspiracy and to effect and accomplish the objects of it, one or more of the co-conspirators committed, among others, the following overt acts, in the District of Puerto Rico and elsewhere, within the jurisdiction of this Court:

1. During different times of this conspiracy, JESUS IVAN SAENZ-BLANCO, a/k/a Andrés, a/k/a Roberto, a/k/a Licenciado, a/k/a Doctor, FRANCISCO VAZQUEZ, a/k/a Frank, a/k/a Francis, a/k/a El Gordo, EDWIN COTTO-SANTIAGO, a/k/a El Gato, a/k/a El Niño, a/k/a El Loco, a/k/a El Pequeño, JORGE PARIS-LOPEZ, a/k/a Ito, HECTOR ANDRADE-RUIZ, a/k/a El Menor, FRANCISCO VAZQUEZ, a/k/a Frank, a/k/a Francis, a/k/a El Gordo, GUSTAVO GARZON-RINCON, a/k/a J, a/k/a Jaime Padilla, RAFAEL HIDALGO-GARCIA, a/k/a El Enano,

SUPERSEDING INDICTMENT

Criminal No. 98-189(HL)

Page 13

a/k/a Gigante, ALBERTO D. SANCHEZ-ALVAREZ, a/k/a Gilberto, CARLOS M. SANCHEZ-ALVAREZ, and others imported, caused to be imported, and attempted to import narcotics into the District of Puerto Rico and elsewhere.

2. In or about mid May of 1998, JESUS IVAN SAENZ-BLANCO, a/k/a Andrés, a/k/a Roberto, a/k/a Licenciado, a/k/a Doctor, instructed EDWIN COTTO-SANTIAGO, a/k/a El Gato, a/k/a El Niño, a/k/a El Loco, to deliver \$150.00 Dollars to FRANCISCO VAZQUEZ, a/k/a Frank, a/k/a Francis, a/k/a El Gordo, for the purchase of a cellular phone to facilitate the communication with the heroin couriers arriving at the piers.

3. On or about July 24, 1998, GILBERTO COWO, a/k/a El Toro, possessed approximately 3,500 grams (gross weight) of heroin while in St. Thomas, U.S.V.I., and attempted to import the same into the District of Puerto Rico.

4. On or about August 9, 1998, ALBERTO D. SANCHEZ-ALVAREZ, a/k/a Gilberto, and CARLOS M. SANCHEZ-ALVAREZ imported approximately 1,319 grams (gross weight) of heroin into the District of Puerto Rico, and attempted to distribute the same.

5. On or about August 25, 1998, JORGE PARIS-LOPEZ, a/k/a Ito, HECTOR ANDRADE-RUIZ a/k/a El Menor, and GUSTAVO GARZON-RINCON a/k/a J., a/k/a Jaime Padilla imported approximately 1,449 grams (gross weight) of heroin into the District of Puerto Rico, and attempted to distribute the same.

6. During different times of this conspiracy, RAFAEL HIDALGO-GARCIA, a/k/a El Enano, a/k/a Gigante, EDWIN COTTO-SANTIAGO, a/k/a El Gato, a/k/a El Niño, a/k/a El Loco, JORGE PARIS-LOPEZ, a/k/a Ito, CECILIO CEBALLOS a/k/a Neno, PEDRO

SUPERSEDING INDICTMENT

Criminal No. 98-189(HL)

Page 14

MARTINEZ-GRELA a/k/a Cuca, RAMON RAMIREZ-BENITEZ, a/k/a El Viejo, a/k/a Moncho, SARA N. ROSA, ROBERTO RODRIGUEZ a/k/a Pichón, JACKELINE ARACHE, a/k/a La Bruja and others, distributed the narcotics that were smuggled into the District of Puerto Rico by JESUS IVAN SAENZ-BLANCO, a/k/a Andrés, a/k/a Roberto, a/k/a Licenciado, a/k/a Doctor, drug trafficking organization.

7. At different times during the Summer of 1998, RAMON RAMIREZ-BENITEZ, a/k/a El Viejo, a/k/a Moncho, SARA N. ROSA, and others traveled to the Dominican Republic to make arrangements for the importation of a load of narcotics into the District of Puerto Rico.

8. At different times during the Summer of 1998, PEDRO MARTINEZ-GRELA, a/k/a Cuca, and others traveled to St. Marteen, N.A., to make arrangements for the importation of a load of narcotics into the District of Puerto Rico.

9. Counts One and Three are incorporated and realleged as overt acts of this conspiracy. All in violation of Title 21, United States Code, Section 960.

**COUNT THREE
CONSPIRACY TO COMMIT MONEY LAUNDERING**

Beginning on a date unknown, but no later than in or about beginning of 1996, and ending on a date unknown, but no earlier than in or about the date of the return of this Superseding Indictment, in the District of Puerto Rico, and in Miami, Florida, New York City, New York, the Dominican Republic, St. Thomas, U.S.V.I., St. Marteen, N.A., Curacao, N.A., Barbados, B.V.I., Colombia, South America, and elsewhere, and within the jurisdiction of this Court,

SUPERSEDING INDICTMENT

Criminal No. 98-189(HL)

Page 15

1. JORGE PARIS-LOPEZ,
also known as Ito,
4. JESUS IVAN SAENZ-BLANCO,
also known as Andrés,
also known as Roberto,
also known as Licenciado,
also known as Doctor,
5. EDNA JIMENEZ-VELAZQUEZ,
also known as Enna,
also known as La Doña,
6. ROBERTO FERRARIO-POZZI,
also known as Robert,
7. RAFAEL HIDALGO-GARCIA,
also known as El Enano,
also known as Gigante,
8. EDWIN COTTO-SANTIAGO,
also known as El Gato,
also known as El Niño,
also known as El Loco,
also known as El Pequeño,
9. CECILIO CEBALLOS,
also known as Neno,
10. LUIS AMARANTE,
also known as Chiqui,
also known as El Grandote,
11. SARA N. ROSA,
12. RAMON RAMIREZ-BENITEZ,
also known as El Viejo,
also known as Moncho,
14. RAMON RODRIGUEZ,
also known as Pichón,
15. JHON SANCHEZ-GUZMAN,
also known as Mario,
16. DEIVID ROJAS,
also known as Gordo,
18. JACKELINE ARACHE,
also known as La Bruja,
19. ROBERTO RODRIGUEZ-SANCHEZ,
20. GIUSEPPE PINCHERA-TORRICE,
21. MAHENDRA HAYES,
also known as Neil,

SUPERSEDING INDICTMENT

Criminal No. 98-189(HL)

Page 16

22. LUIS R. RIVERA-VALENTIN,
23. ONELL MIRANDA FERNANDEZ,
24. RADAMES PEÑA-PEÑA,
also known as El Negro,
also known as El Chino,
28. ADRIANA ROJAS,
29. MERCEDES R. DE LOS SANTOS,
also known as Roxanna,
30. MULTIPIX, INC.,
also known as Phone Home,

the defendants herein, did unlawfully, knowingly, intentionally, and willfully combine, conspire, and agree together and with each other and with other persons both known and unknown to the Grand Jury, to commit offenses against the United States in violation of Title 18, United States Code, Sections 1956 and 1957, including:

a. To knowingly conduct or attempt to conduct financial transactions, knowing that the proceeds involved in the financial transactions represented the proceeds of some form of unlawful activity, when the financial transactions in fact involved the proceeds of specified unlawful activity, to wit: the importation, distribution, and possession with the intent to distribute more than one (1) kilogram of heroin, as defined in Title 21, United States Code, Sections 846, 963, 952(a), 960, and 841(a)(1), with the intent to promote the carrying on of specified unlawful activity and knowing that the transactions were designed in whole or in part to conceal or disguise the nature, the locations, the source, and the ownership of the proceeds of specified unlawful activity and to avoid a transaction reporting requirement under State or Federal law, contrary to the provisions of Title 18, United States Code, Section 1956(a)(1);

b. To knowingly transport, transmit, transfer, and attempt to transfer monetary

SUPERSEDING INDICTMENT**Criminal No. 98-189(HL)****Page 17**

instruments and funds from a place in the United States to or through a place outside the United States and to a place in the United States from or through a place outside the United States: 1) with the intent to promote the carrying on of specified unlawful activity, to wit: the importation, distribution, and possession with the intent to distribute more than one (1) kilogram of heroin, as defined in Title 21, United States Code; Sections 846, 963, 952(a), 960, and 841(a)(1); and 2) knowing that the monetary instruments and funds involved represented the proceeds of some form of unlawful activity, and knowing that such transportations, transmission, and transfer were designed in whole or in part to conceal and disguise the nature, the locations, the source, the ownership and the control of the proceeds of said unlawful activity, and to avoid a transaction reporting requirements under State or Federal law contrary to the provisions of Title 18, United States Code, Section 1956(a)(2);

c) To knowingly engage or attempt to engage in a monetary transaction involving criminally derived property that was of a value greater than \$10,000, which property was derived from specified unlawful activity, to wit: the importation, distribution, and possession with the intent to distribute more than one (1) kilogram of heroin as defined in Title 21, United States Code, Sections 846, 963, 952(a), 960, and 841(a)(1); contrary to the provisions of Title 18, United States Code, Section 1957.

MANNER AND MEANS TO ACCOMPLISH THE CONSPIRACY

In order to accomplish the object of this conspiracy the proceeds of the sale of controlled substances by JESUS IVAN SAENZ-BLANCO, a/k/a Andrés a/k/a Roberto, a/k/a Licenciado, a/k/a Doctor, were used to purchase, among other things, airline tickets, cellular telephones, and for the

SUPERSEDING INDICTMENT

Criminal No. 98-189(HL)

Page 18

payment of expenses and services to promote the carrying on of unlawful conduct by use of these proceeds in drug related activities, and to conceal and disguise the nature, location, source, ownership, and control of such proceeds from law enforcement and taxing authorities. The manner and means by which this purpose was carried out included the following:

1. It was part of the conspiracy that the defendants and other co-conspirators played different roles, took upon themselves different tasks and participated in the affairs of the conspiracy through various criminal acts. The defendants and their co-conspirators made themselves and their services available at various times through the conspiracy and participated in selected money laundering transactions on an "as needed" basis.

2. It was further part of the conspiracy that between 1997 and 1998 in the District of Puerto Rico and elsewhere, JESUS IVAN SAENZ-BLANCO a/k/a Andrés, a/k/a Roberto, a/k/a Licenciado, a/k/a Doctor, RAFAEL HIDALGO-GARCIA a/k/a El Enano, a/k/a Gigante; JORGE PARIS-LOPEZ a/k/a Ito, EDWIN COTTO-SANTIAGO, a/k/a El Gato, a/k/a El Niño, a/k/a El Loco, a/k/a El Pequeño, HECTOR ANDRADE-RUIZ, a/k/a El Menor, PEDRO MARTINEZ-GRELA a/k/a Cuca, RAMON RAMIREZ-BENITEZ a/k/a El Viejo, a/k/a Moncho, CECILIO CEBALLOS a/k/a Neno, SARA N. ROSA, RAMON RODRIGUEZ, a/k/a Pichón, and others regularly sold, or caused to be sold, multi-kilogram quantities of heroin.

3. It was further part of the conspiracy that the defendants and their co-conspirators deposited, or caused to be deposited, the cash proceeds obtained from the importation and distribution of narcotics in bank accounts, from which the monies were wire transferred to different states and other countries, and to use and purchase manager's checks, or withdrawn in amounts less

SUPERSEDING INDICTMENT**Criminal No. 98-189(HL)****Page 19**

than \$10,000.

OVERT ACTS

In order to facilitate the objects of the conspiracy, the co-conspirators committed, among others, the following overt acts, in the District of Puerto Rico and elsewhere:

1. On or about February 9, 1996, JESUS IVAN SAENZ-BLANCO, a/k/a Andrés, a/k/a Roberto, a/k/a Licenciado, a/k/a Doctor, and EDNA JIMENEZ-VELAZQUEZ, a/k/a Enna, a/k/a La Doña, opened account no. 004-20508-1 at Banco Popular de Puerto Rico as representatives of Intercambios y Servicios Clark S.A.

2. On or about February 9, 1996, EDNA JIMENEZ-VELAZQUEZ, a/k/a Enna, a/k/a La Doña, withdrew \$7,017.90 from Banco Popular de Puerto Rico account no. 004-20508-1, and wire transferred \$6,980.90 to Foreign Parts Distributor, Inc. in Hialeah, Florida.

3. On the dates hereinafter described, the persons named therein, and to the places described, the JESUS IVAN SAENZ-BLANCO, a/k/a Andrés, a/k/a Roberto, a/k/a Licenciado, a/k/a Doctor's drug trafficking organization structured, purchased, and sent via wire-transfers, to promote the carrying on of unlawful conduct by use of the drug cash proceeds in drug related activities, and to disguise and to conceal in whole or in part the nature, the locations, the source, and the ownership of narcotics proceeds and to avoid a transaction reporting requirement under State or Federal law:

<u>DATE SENT</u>	<u>SENDER's NAME</u>	<u>NAME OF RECEIVER</u>	<u>AMOUNT</u>
January 14, 1998	Roberto Rodríguez Sánchez	Global Corporation	\$38,000
April 30, 1998	Guiseppe Pinchera-Torrice	Intertur Internacional	\$45,000

SUPERSEDING INDICTMENT**Criminal No. 98-189(HL)****Page 20**

		de Turism	
October 22, 1998	Luis Rivera-Valentín	Merrill Lynch, Pierce Fennat, SMI	\$92,800
May 28, 1998	Mahendra Hayes	Korvensa International	\$24,400
June 29, 1998	Onel Miranda-Fernández	I/N/O Hernando Marquez Aristizab	\$120,000

4. During the span of the conspiracy, JESUS IVAN SAENZ-BLANCO, a/k/a Andres, a/k/a Roberto, a/k/a Licenciado, a/k/a Doctor, imparted, or caused to be imparted, instructions to EDNA JIMENEZ-VELAZQUEZ, a/k/a Enna, a/k/a La Doña, ROBERTO FERRARIO-POZZI, a/k/a Robert, RAFAEL HIDALGO-GARCIA, a/k/a El Enano, a/k/a Gigante, MAHENDRA HAYES, a/k/a Neil, LUIS R. RIVERA-VALENTIN, ONELL MIRANDA-FERNANDEZ, JHON SANCHEZ-GUZMAN, a/k/a Mario, ROBERTO RODRIGUEZ-SANCHEZ, RADAMES PEÑA-PEÑA, a/k/a El Negro, a/k/a El Chino, GUISEPPE PINCHERA-TORRICE, and others to send wire transfers from Puerto Rico to places such as Colombia, South America, Barbados, B.V.I., St. Marteen, N.A., Miami, Florida, and elsewhere to be used by JESUS IVAN SAENZ-BLANCO, a/k/a Andrés, a/k/a Roberto, a/k/a Licenciado, a/k/a Doctor, and others to pay for the narcotics load imported into the District of Puerto Rico.

5. At all times during the existence of the conspiracy, EDNA JIMENEZ-VELAZQUEZ, a/k/a Enna, a/k/a La Doña, EDWIN COTTO-SANTIAGO, a/k/a El Gato, a/k/a El Niño, a/k/a El Loco, a/k/a El Pequeño, CECILIO CEBALLOS, a/k/a Neno, JORGE PARIS-LOPEZ, a/k/a Ito, JACKELINE ARACHE, a/k/a La Bruja, PEDRO MARTINEZ-GRELA, a/k/a Cuca, RAMON RAMIREZ-BENITEZ, a/k/a El Viejo, a/k/a Moncho, SARA N. ROSA, ROBERTO RODRIGUEZ,

SUPERSEDING INDICTMENT

Criminal No. 98-189(HL)

Page 21

a/k/a Pichón, and others, "stashed" (stored, or secreted from view) large amounts of monies, from the distribution of narcotics by JESUS IVAN SAENZ-BLANCO a/k/a Andrés, a/k/a Roberto, a/k/a Licenciado, a/k/a Doctor, drug trafficking organization, for its later delivery to the money launderer

6. At all times during the existence of the conspiracy, RAFAEL HIDALGO-GARCIA, a/k/a El Enano, a/k/a Gigante, LUIS AMARANTE, a/k/a Chiqui, a/k/a El Grandote, EDWIN COTTO-SANTIAGO, a/k/a El Gato, a/k/a El Niño, a/k/a El Loco, a/k/a El Pequeño, CECILIO CEBALLOS, a/k/a Neno, JORGE PARIS-LOPEZ, a/k/a Ito, JACKELINE ARACHE, a/k/a La Bruja, RAMON RAMIREZ-BENITEZ, a/k/a El Viejo, a/k/a Moncho, SARA N. ROSA, ROBERTO RODRIGUEZ, a/k/a Pichón, assisted JESUS IVAN SAENZ-BLANCO, a/k/a Andrés, a/k/a Roberto, a/k/a Licenciado, a/k/a Doctor, in collecting and laundering the proceeds of his drug trafficking activities at either MULTIPIX, INC., a/k/a PHONE HOME (an alleged computer and long-distance call business operated by co-conspirator ROBERTO FERRARIO-POZZI), or at MULTI-ENVIOS (an alleged money remitting business operated by co-conspirator EDNA JIMENEZ-VELAZQUEZ, a/k/a Enna, a/k/a La Doña).

7. During the span of this conspiracy, JESUS IVAN SAENZ-BLANCO, a/k/a Andrés, a/k/a Roberto, a/k/a Licenciado, a/k/a Doctor, sent or caused to be sent large amounts of cash to ADRIANA ROJAS in Miami, Florida for the subsequent deposit in various bank accounts under third parties names.

8. In or about the beginning of May 1998, JESUS IVAN SAENZ-BLANCO, a/k/a Andrés, a/k/a Roberto, a/k/a Licenciado, a/k/a Doctor, instructed and EDWIN COTTO-SANTIAGO a/k/a El Gato, a/k/a El Niño, a/k/a El Loco, a/k/a El Pequeño, to collect cash proceeds from the

SUPERSEDING INDICTMENT

Criminal No. 98-189(HL)

Page 22

narcotics distribution, and to subsequently deliver them to MULTIPIX, INC., a/k/a Phone Home.

9. On an unknown date, but at a time before June 1998 and during the span of this conspiracy, JACKELINE ARACHE, a/k/a La Bruja, picked-up and delivered a large amount of cash, belonging to the JESUS IVAN SAENZ-BLANCO, a/k/a Andrés, a/k/a Roberto, a/k/a Licenciado, a/k/a Doctor, drug trafficking organization to MULTIPIX, INC., a/k/a Phone Home.

10. On or about June 6, 1998, RAFAEL HIDALGO-GARCIA, a/k/a El Enano, a/k/a Gigante, and MERCEDES R. DE LOS SANTOS, a/k/a Roxanna, planned the pick-up of cash proceeds and the subsequent deposit by DE LOS SANTOS at the First Bank account.

11. On or about June 7, 1998, JESUS IVAN SAENZ-BLANCO, a/k/a Andrés, a/k/a Roberto, a/k/a Licenciado, a/k/a Doctor, discussed with and later delivered to RADAMES PEÑA-PEÑA, a/k/a El Negro, a/k/a El Chino approximately \$45,000.00 dollars in cash at Plaza Las Americas, to be sent to an un-identified co-conspirator in Colombia, South America.

12. In or about June 8, 1998, JESUS IVAN SAENZ-BLANCO, a/k/a Andrés, a/k/a Roberto, a/k/a Licenciado, a/k/a Doctor, CECILIO CEBALLOS a/k/a Neno, and JORGE PARIS-LOPEZ, a/k/a Ito, delivered large amounts of cash to ROBERTO FERRARIO-POZZI, a/k/a Robert, GIUSEPPE PINCHERA-TORRICE, LUIS R. RIVERA-VALENTIN, ONELL MIRANDA-FERNANDEZ, at MULTIPIX, INC., a/k/a Phone Home to be laundered.

13. In or about the beginning of July of 1998, SARA N. ROSA and RAMON RODRIGUEZ, a/k/a Pichón, planned and made the arrangements to deliver approximately \$100,000.00 in cash, belonging to JESUS IVAN SAENZ-BLANCO, a/k/a Andrés, a/k/a Roberto, a/k/a Licenciado, a/k/a Doctor, drug trafficking organization to DEIVID ROJAS, a/k/a Gordo, in

SUPERSEDING INDICTMENT

Criminal No. 98-189(HL)

Page 23

Miami, Florida.

14. In or about the beginning of July 1998, EDNA JIMENEZ-VELAZQUEZ, a/k/a Enna, a/k/a La Doña, delivered to RAFAEL HIDALGO-GARCIA, a/k/a El Enano, a/k/a Gigante, approximately \$44,000.00 in cash, belonging to the JESUS IVAN SAENZ-BLANCO, a/k/a Andrés, a/k/a Roberto, a/k/a Licenciado, a/k/a Doctor, drug trafficking organization, to be wire transferred to Colombia, South America.

15. In or about mid July of 1998, JESUS IVAN SAENZ-BLANCO, a/k/a Andrés, a/k/a Roberto, a/k/a Licenciado, a/k/a Doctor, and MAHENDRA HAYES, a/k/a Neil discussed the delivery of cash at MULTIPIX, INC., a/k/a Phone Home to be laundered.

16. In or about mid July, 1998, JESUS IVAN SAENZ-BLANCO, a/k/a Andrés, a/k/a Roberto, a/k/a Licenciado, a/k/a Doctor, and LUIS R. RIVERA-VALENTIN discussed the delivery of cash at MULTIPIX, INC., a/k/a Phone Home.

17. In or about the beginning of August 1998, JESUS IVAN SAENZ-BLANCO, a/k/a Andrés, a/k/a Roberto, a/k/a Licenciado, a/k/a Doctor instructed JORGE PARIS-LOPEZ, a/k/a Ito, to contact ROBERTO FERRARIO-POZZI, a/k/a Robert, or MAHENDRA HAYES, a/k/a Neil, on his behalf to coordinate the delivery of large amounts of cash at MULTIPIX, INC., a/k/a Phone Home to be laundered.

18. In or about mid August, 1998, JESUS IVAN SAENZ-BLANCO, a/k/a Andrés, a/k/a Roberto, a/k/a Licenciado, a/k/a Doctor, delivered approximately \$43,100.00 in cash to ONELL MIRANDA-FERNANDEZ for its transfer by wire to either JHON SANCHEZ-GUZMAN, a/k/a Mario, or to an unidentified co-conspirator.

SUPERSEDING INDICTMENT

Criminal No. 98-189(HL)

Page 24

19. On or about August 16, 1998, JESUS IVAN SAENZ-BLANCO, a/k/a Andrés, a/k/a Roberto, a/k/a Licenciado, a/k/a Doctor, instructed RAFAEL HIDALGO-GARCIA, a/k/a El Enano, a/k/a Gigante, to pick-up approximately \$62,700.00 in cash from LUIS AMARANTE, a/k/a Chiqui, a/k/a El Grandote, for its wire transfer to an unidentified co-conspirator in Colombia, South America.

20. Counts One and Two are incorporated and realleged a overt acts of this conspiracy. All in violation of Title 18, United States Code Section 1956(h).

COUNT FOUR
(FORFEITURE ALLEGATION)

A. The violations alleged in Counts One through Three of this Superseding Indictment are realleged and incorporated by reference herein.

B. Pursuant to Title 18, United States Code, Section 982(a)(1), each defendant who is convicted of one or more of the offenses set forth in Counts One through Three shall forfeit to the United States the following property:

1. All right, title, and interest in any and all property involved in each offense in violation of Title 18, United States Code, Section 1956, or conspiracy to commit such offense, for which the defendant is convicted, and all property traceable to such property, including the following: a) all money or other property that was the subject of each transaction, transportation, transmission or transfer in violation of Section 1956(a)(1) or (2); b) all commissions, fees and other property constituting proceeds obtained as a result of those violations; and c) all property used in any manner or part to commit or to facilitate the commission of those violations; to wit:

-The contents held in First Bank Account # 0302007057, in the name of Roberto FERRARIO, and any related accounts.

SUPERSEDING INDICTMENT

Criminal No. 98-189(HL)

Page 25

-The contents held in First Bank Account # 03-05001378 , in the name of MULTIPIX, Inc., and any related accounts.

-The contents held in First Bank Account # 03-05001389 in the name of MULTIPIX, Inc., and any related accounts.

-The contents, up to the amount of \$113,000.00, held in Sun Trust Bank Account #0793003050117 in the name of A & E Used Truck Parts, and any related accounts.

-The contents, up to the amount of \$200,000.00, held in Banco Commercials Italiana #5471-705-01-75, in the name of Agostino Ferrari, S.A., and any related accounts.

-The contents, up to the amount of \$105,866.00, held in Citibank Account # 40601943, in the name of Avery Dennison MFD, and any related accounts.

-The contents, up to the amount of 230,000.00, held in Swiss Bank Corporation Account #01WA384445000, in the name of Bank Hapoalim, and any related accounts.

-The contents held in Nations Bank Account # 1295773304, in the name of Bishop Diesel Parts, and any related accounts.

-The contents held in Nations Bank Account #1252772698, in the name of Bishop Truck Parts, and any related accounts.

-The contents held in Credit Suisse P.B. Account # 017247774542, in the name of Brianzanet, and any related accounts.

-The contents held in Citibank Account # 16187869, in the name of Brookfield Automotive Export Corp, and any related accounts.

-The contents held in Total Bank Account # 30311603906, in the name of C. A. TRUCK PARTS INC., and any related accounts.

-The contents held in Correstate Bank Account # 01177393, in the name of Canada Packers, and any related accounts.

-The contents held in Bank of Montreal Account #4505453, in the name of Carlos Olivares, and any related accounts.

-The contents held in Ocean Bank Account # 01008991321-05, in the name of Compumax, and any related accounts.

SUPERSEDING INDICTMENT

Criminal No. 98-189(HL)

Page 26

-The contents held in Extebandes Account # 120607677, in the name of Concorcio Nesher LTD., and any related accounts.

-The contents held in Commerce Bank Account #3083003824, in the name of Concorcio Nesher LTD., and any related accounts.

-The contents, up to the amount of \$550,733.00, held in Chase Manhattan Bank Account #400476398, in the name of Corfipacifico, and any related accounts.

-The contents held in Nations Bank Account # 3660879720, in the name of DOS International, and any related accounts.

-The contents held in Banco Central Hispano Accounts # 2814037049, in the name of Edgar Alfredo Parra Nino, and any related accounts.

-The contents held in Banco Zaragozano Account # 108392, in the name of Edgar Alfredo Parra Nino, and any related accounts.

-The contents held in Bank of America Account # 1233521749, in the name of FBO Plantronic, B.V., and any related accounts.

-The contents held in Nations Bank Account # 3660264571, in the name of Fortuity International Inc., and any related accounts.

-The contents held in Republic National Account # 0311007692, in the name of Fortuity International Inc., and any related accounts.

-The contents held in Connex Bank Account # 1286002806-06, in the name of Fortuity International Inc., and any related accounts.

-The contents held in First Bank of the Americas Account # 12035, in the name of Galeria el Museo, and any related accounts.

-The contents held in Sun Trust Bank Account # 05970-14456806, in the name of Galeria el Museo, and any related accounts.

-The contents held in Bank of Tokyo Ltd Account # 0144504339, in the name of Game Latin Inc, and any related accounts.

-The contents held in The Tokio Bank Futaba Branch Account # 185184, in the name of Global Corporation, and any related accounts.

SUPERSEDING INDICTMENT

Criminal No. 98-189(HL)

Page 27

-The contents, up to the amount of \$112,674.42, held in Citibank International Account #4274725, in the name of Hani Mustafa Hassan, and any related accounts.

-The contents held in Bankboston International Corp. Account # 9047939, in the name of Hernado Marquez Aristizabal, and any related accounts.

-The contents held in Israel Discount Bank Account # 352050431, in the name of Intermark Industries Inc., and any related accounts.

-The contents held in First Bank of the Americas Account # 1000123960, in the name of Intertur Internacional De Turism, and any related accounts.

-The contents, up to the amount of \$250,000.000, held in Ocean Bank Account #50509821105, in the name of Invalores LTDA, and any related accounts.

-The contents held in Banco Zaragozano Account # 105656, in the name of Jaime Hernández Parra Castellano, and any related accounts.

-The contents held in Korea Exchange Bank Account # 117JSD101517, in the name of KORVENSA International, and any related accounts.

-The contents, up to the amount of \$155,000.00, held in National Westminster Bank #14006057349, in the name of M.A. Smelt International Trade, and any related accounts.

-The contents held in Correstate Bank Account # 01177393, in the name of Maple Leaf Food Inc., and any related accounts.

-The contents held First Union Bank Account # 9980279923, in the name of Memory System Corp., and any related accounts.

-The contents held Commerce Bank Account #128600147006, in the name of Memory System Corp., and any related accounts.

-The contents held in Sun Trust Bank Account # 45007328116, in the name of Miami Net, and any related accounts.

-The contents held in Ocean Bank Account # 010067276913, in the name of Microinformática, and any related accounts.

-The contents held in Republic National Account # 291004832, in the name of Microtel Int Inc., and any related accounts.

SUPERSEDING INDICTMENT

Criminal No. 98-189(HL)

Page 28

-The contents held in Barnett Bank Account # 1596427376, in the name of Microtel Int Inc., and any related accounts.

-The contents held in Commerce Bank Account #128600135306, in the name of Microtel Int Inc., and any related accounts.

-The contents held in Cathay Bank Account # 001-210-025, in the name of Mobil Tech Industry Co LTD., and any related accounts.

-The entire contents held in Citibank Account # 40611172, in the name Morgan Stanley Dean Witter, and any related accounts.

-The contents held in Deutsche Bank Argentina Account #00-2638588, in the name of Orchidye S.A., and any related accounts.

-The contents, up to the amount of \$110,000.00, held in Banco Cafetero International Account #593104031, in the name of Orlando Fajardo, and any related accounts.

-The contents held in Marine Midland Bank Account # 750196343, in the name of P.S. International, and any related accounts.

-The contents held in Huntington National Bank Account # 01891197147, in the name of P.S. International, and any related accounts.

-The contents, up to the amount of \$106,843.00, held in Cho Hung Bank Account #37471000585, in the name of Royal Auto Parts, and any related accounts.

-The contents held in First Bank of the Americas Account # 1100881018, in the name of Rozatta LTD, and any related accounts.

-The contents held Sun Trust Bank Account # 793003048456, in the name of S & B Used Truck Parts Inc., and any related accounts.

-The contents held in Chase Manhattan Bank Account #8942, in the name of Sansei Tsusho Co Ltd., and any related accounts.

-The contents held in Ocean Bank Account # 0100940437-05, in the name of Seaford Enterprises, LTD., and any related accounts.

-The contents held in Barnet Bank of South Florida Account # 1596248201, in the name of Sumidata, and any related accounts.

SUPERSEDING INDICTMENT

Criminal No. 98-189(HL)

Page 29

-The contents held in Northern Trust Bank Accounts # 1940000018 and # 1940000007, in the name of Sumidata, and any related accounts.

-The contents held in The Dai Ichi Kangyo Bank LTD Account # 1900125719, in the name of WATEX International, and any related accounts.

-The contents held in Banco Popular account number 011-254521, in the name of Roberto Ferrario Pozzi d/b/a GILLIGANS, and any related accounts.

-The contents held in Morgan Stanley Dean Witter account number 660 080 -848, in the name of Keith Valbuena, and any related accounts.

-The contents held in Morgan Stanley Dean Witter account number 660 080 -850, in the name of Michael Valbuena, and any related accounts.

-The contents held in Morgan Stanley Dean Witter account number 660 080 -849, in the name of Martin Valbuena, and any related accounts.

-The contents held in Morgan Stanley Dean Witter account number 660 083-577, in the name of Pamela Hedrick, and any related accounts.

-The contents held in Morgan Stanley Dean Witter account number 660 080 -847, in the name of Mary Valbuena, and any related accounts.

-The contents held in Morgan Stanley Dean Witter, in the name of Julio Valbuena, and any related accounts.

-The contents held in Loyds Bank PLC, account number 38580000, in the name of Mr. and/or Mrs. J. E. Valbuena, and any related accounts.

-The contents held in First National Bank of Mountdora, account number 0369548, in the name of Julio Valbuena, and any related accounts.

-The contents held in Charles Schwab (FBO) & Company, account number 90056512, in the name of Julio E. Valbuena, and any related accounts.

-The contents held in Capital Bank, in the name of Gloria Exchange Corporation, and any related accounts.

-The contents held in Signet Bank, Richmond, Virginia in the name of New York Bay

SUPERSEDING INDICTMENT

Criminal No. 98-189(HL)

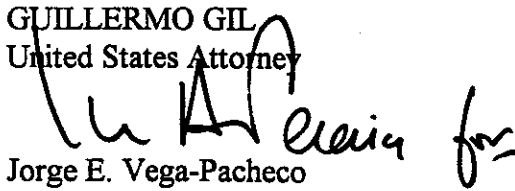
Page 30

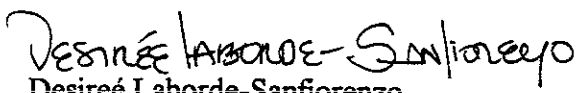
Remittance Corporation, and any related accounts.

2. A sum of money equal to the total amount of money involved in each offense, or conspiracy to commit such offense, for which the defendant is convicted. If more than one defendant is convicted of an offense, the defendants so convicted are jointly and severally liable for the amount involved in such offense.

C. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b), each defendant shall forfeit substitute property, up to the value of the amount described in paragraph B, if, by any act or omission of the defendant, the property described in paragraph B, or any portion thereof, cannot be located upon the exercise of due diligence; has been transferred, sold to or deposited with a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.

GUILLERMO GIL
United States Attorney


Jorge E. Vega-Pacheco
Assistant U.S. Attorney
Chief, Criminal Division


Desiree Laborde-Sanfiorenzo
Assistant U.S. Attorney
Date: December 7, 1998